

**COMMONWEALTH OF VIRGINIA**  
**Department of Environmental Quality**  
**West Central Regional Office**

**STATEMENT OF LEGAL AND FACTUAL BASIS**

Stanley Furniture Company  
Stanleytown Plant – Stanleytown, Virginia  
Permit No. WCRO- 30320

Title V of the 1990 Clean Air Act Amendments required each state to develop a permit program to ensure that certain facilities have federal Air Pollution Operating Permits, called Title V Operating Permits. As required by 40 CFR Part 70 and 9 VAC 5 Chapter 80, Stanley Furniture Company has applied for a Title V Operating Permit for its Stanleytown facility. The Department has reviewed the application and has prepared a draft Title V Operating Permit.

Engineer/Permit Contact: \_\_\_\_\_ Date: July 2, 2008

Air Permit Manager: \_\_\_\_\_ Date: July 2, 2008

## **FACILITY INFORMATION**

### Permittee

Stanley Furniture Company  
1401 Fairystone Park Highway  
Stanleytown, VA

### Facility

Stanley Furniture Company  
1401 Fairystone Park Highway  
Stanleytown, VA

County-Plant Identification Number: 51- 089-0037

## **SOURCE DESCRIPTION**

NAICS Code: 337122 – Non-upholstered Wood Household Furniture Manufacturing

This facility is a large, conventional wood household furniture manufacturing plant which manufactures a wide variety of wood furniture. The plant receives and then dries rough sawn lumber (primarily hardwood) in a total of 13 lumber drying kilns. Various woodworking operations (cutting, sizing, sanding, etc) are conducted and all the particulate emissions are collected by 25 main wood dust air handling systems that are controlled by fabric filters. Wood waste is the primary fuel for two of the three boilers that are used to provide steam to the facility.

Three boilers are onsite – FB1 (wood/fuel oil), FB2 (wood/coal) and FB3 (fuel oil). Various assembly operations are conducted; contact adhesive operations and miscellaneous gluing operations are conducted as part of these operations. Finish is applied to the wood furniture primarily by spraying. The finishing operation and contact adhesive operations are subject to MACT JJ, the Lumber kilns, Pre-dryer kiln, Dimension Mill - Plant 06 (Fingerjoint Machine, Rosenquist HF Gluer, L & L Clam Shell Gluer and Taylor Glue Reels), Panel Plant - Plant 05 (Wemhoner Hot Press, Buerkle Hot Press, Newman Cold Presses, Fletcher Combo Machine, Fletcher Edge Banders, Holzma Dbl Sided Bander and Rosenquist HF Gluer) and Shoda Building - Plant 07 (Rosenquist Clam Shell) are subject to MACT DDDD and the boilers are not subject to NSPS Dc.

The facility is a Title V major source of volatile organic compounds (VOCs), Hazardous Air Pollutants (HAPs), Particulate Matter (PM<sub>10</sub>), Nitrogen Oxides (NO<sub>x</sub>), Sulfur Dioxide (SO<sub>2</sub>) and Carbon Monoxide (CO). This source is located in an attainment area for all pollutants, and is a PSD major source; the source has actual emission of VOCs over 250 tpy and potential emissions

of PM<sub>10</sub>, NO<sub>x</sub>, SO<sub>2</sub> and CO of over 250 tpy. The facility is currently permitted under three Minor NSR Permits (September 21, 1993; January 14, 2000 amended on June 8, 2001; and January 14, 2000 amended December 12, 2007) and one PSD permit (May 19, 1999 amended July 29, 2002).

## **COMPLIANCE STATUS**

A partial compliance evaluation of this facility, including a site visit, was conducted on February 8, 2008. In addition, all reports and other data required by permit conditions or regulations, which are submitted to the DEQ, are evaluated for compliance. Based on these compliance evaluations, the facility has not been found to be in violation of any state or federal applicable requirements at this time.

## **PERMIT RENEWAL**

The following changes were made to the Title V permit during this permit renewal:

1. The Minor NSR permit dated January 14, 2000 was updated to include a new fabric filter (BF5-4) – the permit conditions for the existing fabric filter (BF5-2) were also modified as a result of adding this new fabric filter. The Title V permit was updated with these new and modified permit conditions.
2. MACT DDDD (PCWP) is now applicable to the Wood Drying Kilns (EU-DK) and some of the miscellaneous gluing operations included in the Contact Adhesive emission unit (EU-Con-Adh). Since the facility uses Polyvinyl Acetate (PVA) glues, the only requirements are recordkeeping and reporting. The facility has cited an EPA determination dated July 13, 2005 from Michael Alushin to Bill Purdue for the exemption from emission limits due to the use of PVA glues. A copy of the EPA determination is attached to this Statement of Basis and a requirement was added to the recordkeeping section of EU-Con-Adh that requires the source to maintain an inventory of the types of glues that are used on the equipment that is subject to MACT DDDD.
3. The current DEQ boilerplate for Title V permits was used to draft this permit renewal.
4. Compliance Assurance Monitoring (CAM) applicability was reviewed for the facility and was determined to not be applicable – see the CAM review section under the Inapplicable Requirements section of this Statement of Basis and Tab 6 of the permit application for supporting documentation.

## EMISSION UNIT AND CONTROL DEVICE IDENTIFICATION

The emissions units at this facility consist of the following:

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity*	Pollution Control Device (PCD) Description	Pollutant Controlled	Applicable Permit Date
<b>Fuel Burning Equipment</b>						
EU-FB (Fuel Boilers – FB1, FB2 & FB3)	FB1	FB1, pre-1967 Erie City type 4C-28 boiler. Wood fuel, distillate fuel oil (No. 2) backup. Not NSPS Dc – constructed prior to 1989.	37.0 million Btu/hr input rated capacity (2.5 tph wood fuel @ 7,500 Btu/lb, or 270 gal/hr No. 2 fuel oil)	NA	NA	NA
	FB2	FB2, 1967 Union Iron Works type VO boiler. Wood fuel, coal backup. Not NSPS Db – constructed prior to 1984.	110.0 million Btu/hr input rating capacity (7.3 ton/hr wood fuel at 7,500 Btu/lb, 4.2 tons/hr coal at 13,000 Btu/lb)	NA	NA	NA
	FB3	FB3, 1990 Hurst boiler. No. 2 fuel oil is the only fuel. Not NSPS Dc – smaller than 10 million Btu/hr rated capacity.	8.46 million Btu/hr input rated capacity (62 gal/hr).	NA	NA	NA

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity*	Pollution Control Device (PCD) Description	Pollutant Controlled	Applicable Permit Date
<b>Woodworking Equipment</b>						
EU-WW		Woodworking: all woodworking equipment, including hogging and material transfers and all woodworking dust collection systems. Includes (a) 22 main fabric filters on existing wood dust air handling systems, and (b) 4 main fabric filters BF1-3, BF5-2, BF5-3 and BF5-4 on NSR permitted wood dust air handling systems.	NA	Closed loop cyclones without emissions, 26 main fabric filters vented to atmosphere including all woodworking equipment all woodworking dust collection systems.	PM & PM <sub>10</sub>	September 21, 1993 (BF1-3) December 12, 2007 (BF5-2 & BF5-4) June 8, 2001 (BF5-3)
<b>Furniture Finishing Equipment</b>						
EU-F	F1	All Finishing operations other than F2 (Plant 2) finishing operations. Includes 37 finishing spray booths and related facilities, including various ovens and 6 washoff tanks. MACT JJ (40 CFR Subpart JJ) applies to this emission unit.	NA	Spray booth water curtains, dry filters or DEQ approved equivalent.	PM & PM <sub>10</sub>	NA
	F2	All F2 (Plant 2) Finishing operations. Includes 11 finishing spray booths and one (1) community oven. Includes a community oven. MACT JJ (40 CFR 63 Subpart JJ) applies.	NA	Spray booth water curtains, dry filters or DEQ approved equivalent.	PM & PM <sub>10</sub>	May 19, 1999 PSD permit amended July 29, 2002

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity*	Pollution Control Device (PCD) Description	Pollutant Controlled	Applicable Permit Date
<b>Contact Adhesive Operation</b>						
EU-Con-Adh	Con-Adh	One (1) adhesive spray booth. MACT JJ (40 CFR 63 Subpart JJ) applies. MACT DDDD (40 CFR 63 Subpart DDDD) applies to the Dimension Mill - Plant 06 (Fingerjoint Machine, Rosenquist HF Gluer, L & L Clam Shell Gluer and Taylor Glue Reels), Panel Plant - Plant 05 (Wemhoner Hot Press, Buerkle Hot Press, Newman Cold Presses, Fletcher Combo Machine, Fletcher Edge Banders, Holzma Dbl Sided Bander and Rosenquist HF Gluer) and Shoda Building - Plant 07 (Rosenquist Clam Shell)	NA	Spray booth water curtains, dry filters or DEQ approved equivalent.	PM & PM <sub>10</sub>	NA
<b>Lumber Drying Kilns</b>						
EU-DK	NA	Lumber Drying Kilns – 12 Package kilns and one (1) Pre-Drying kiln, combined.	1,905,000 Brd ft capacity Approximately 35,000,000 Brd ft/yr throughput.	NA	NA	NA

## EMISSIONS INVENTORY

A copy of the 2007 annual emission update or permit application emission inventory is attached. Emissions are summarized in the following tables.

2007 Facility Criteria Pollutant Emissions

	2007 Criteria Pollutant Emission in Tons/Year				
Emission Unit	CO	NO <sub>x</sub>	PM <sub>10</sub>	SO <sub>2</sub>	VOC
EU-FB (FB1)	17.076	13.945	3.415	0.712	0.484
EU-FB (FB2)	55.303	51.199	11.211	28.647	1.487
EU-FB (FB3)	0.086	0.345	0.002	1.225	0.003
EU-WW	---	---	12.608	---	---
EU-F	---	---	---	---	508.580
EU-DK	---	---	---	---	2.580
Total	72.465	65.489	27.236	30.584	513.134

2007 Facility Hazardous Air Pollutant Emissions

Pollutant	2007 Hazardous Air Pollutant Emission in Tons/Yr
Lead (Pb)	0.003
Toluene	24.9

## EMISSION UNIT APPLICABLE REQUIREMENTS

### EU-FB

### Limitations

Particulate emissions from FB1 and FB2 are required to be controlled by multicyclones (Condition III.A.1 and 2).

The approved fuels for the boilers are: FB1 – wood and No. 2 fuel oil, FB2 – wood and coal and FB3 – No. 2 fuel oil (Conditions III.A.3, 4 and 5).

The emission limits for FB1 are PM and PM<sub>10</sub>– 0.30 lbs/million Btu input and SO<sub>x</sub> 0.51 lbs/million Btu input. The PM and PM<sub>10</sub> emission limits are based on calculations that are contained in 9 VAC 5-40-900. The SO<sub>x</sub> limit was changed from an \* to a numerical limit and is based on AP-42 emission factors - calculations are attached – March 21, 2008 Email to Dave Maddox (Condition III.A.6).

The emission limits for FB2 are PM and PM<sub>10</sub>– 0.30 lbs/million Btu input and SO<sub>x</sub> 2.64 lbs/million Btu input. The PM and PM<sub>10</sub> emission limits are based on calculations that are contained in 9 VAC 5-40-900. The SO<sub>x</sub> emission limit is based on calculations that are contained in 9 VAC 5-40-930 (Condition III.A.7)

The emission limits for FB3 are PM and PM<sub>10</sub>– 0.014 lbs/million Btu input and SO<sub>x</sub> 0.51 lbs/million Btu input. These limits were changed from an \* to a numerical limit and are based on AP-42 emission factors - calculations are attached – March 21, 2008 Email to Dave Maddox (Condition III.A.8).

Visible emissions from FB1, FB2 and FB3 shall not exceed 20 percent opacity except during one six-minute period in any one hour in which visible emissions shall not exceed 60 percent opacity (Conditions III.A.9 and 10).

### **Monitoring**

The multicyclones on FB1 and FB2 are required to have an annual internal inspection to insure structural integrity (Condition III.B.1).

Visible emission evaluations on each boiler (FB1, FB2 and FB3) are required weekly (Condition III.B.2).

Operation and Maintenance Procedure requirements for the boilers and multicyclones are outlined in the permit – these requirements include developing a maintenance schedule, inspection schedule, written operating procedures, training, spare parts and recordkeeping (Condition III.B.3).

### **Recordkeeping**



Records of fuel certifications and emission data and operating parameters in order to ensure compliance are required to be maintained by the source. These records include fuel throughputs, annual emissions, annual Btu throughput from FB2, results of stack tests and visible emission evaluations and Operation and Maintenance records (Condition III.C.1, 2 and 3).

### **Testing**

The permit does not require source tests for FB1 and FB3. The DEQ and EPA have authority to require testing not included in this permit if necessary to determine compliance with an emission limit or standard. The source is required to conduct once per permit testing on FB2, however, the source has the option to postpone testing if the throughput in Btus does not exceed 50% of the annual capacity factor for that boiler. (Conditions III.D.1, 2, 3 and 4)

### **Reporting**

Reporting requirements are contained in the General Conditions section of the permit.

### **EU-WW**

### **Limitations**

All wood dust emission sources and wood dust air handling systems are required to be controlled by fabric filters, closed loop cyclones, or DEQ approved equivalent (Condition IV.A.1).

Wood working air handling systems BF1-3, BF5-2, BF5-3 and BF5-4 have annual hourly operation limits, grain loading limits of 0.01 grains per standard cubic feet of exhaust gas, hourly and annual PM and PM<sub>10</sub> emission limits and opacity limits of 5 and 10% (Condition IV.A.2, 3, 4, 6, 7, 8, 9, 10 and 11).

Wood working air handling systems (except for BF1-3, BF5-2, BF5-3 and BF5-4) have grain loading limits of 0.05 grains per standard cubic feet of exhaust gas and opacity limits of 20% (Conditions IV.A.5, 10 and 11).

### **Monitoring**

Weekly visible emission observations are required from each fabric filter; a log of the observations is required to be maintained (Condition IV.B.1).

Weekly recordings are required of the pressure drop across each fabric filter; a log of the observations is required to be maintained (Condition IV.B.1).

Operation and Maintenance Procedure requirements for the fabric filters are outlined in the permit – these requirements include developing a maintenance schedule, inspection schedule, written operating procedures, training, spare parts and recordkeeping (Condition IV.B.2).

### **Recordkeeping**

Records of emission data and operating parameters in order to ensure compliance are required to be maintained by the source. These records include annual wood throughput, hours of operation for fabric filters with annual limits, results of visible emission evaluations and Operation and Maintenance records (Condition IV.C.1, 2 and 3).

### **Testing**

The permit does not require source tests for the fabric filters. The DEQ and EPA have authority to require testing not included in this permit if necessary to determine compliance with an emission limit or standard (Conditions IV.D.1, 2 and 3).

### **Reporting**

Reporting requirements are contained in the General Conditions section of the permit.

### **EU-F**

#### **Limitations**

Particulate emissions from the spray booths are required to be controlled by dry filters, water curtain spray booths or equivalent (Condition V.A.1).

Volatile organic compounds (VOC) are required to be handled and disposed of properly (Condition V.A.2).

The Plant 2 Finishing Line VOC shall be minimized by the use of proper spraying techniques, HVLP and/or air assisted airless spray equipment and by complying with the work practices in MACT JJ; VOC throughput is limited to 350 tons/year (Condition V.A.3 and 4).

The Plant 2 Finishing Line is limited to 3.1 million gross board feet of lumber throughput per year (Condition V.A.5).

The Plant 2 Finishing Line particulate emissions are limited to 5.0 tons/year (Condition V.A.6).

Visible emissions from each Plant 2 Finishing Line spray booth is limited to five percent opacity,

except during one six- minute period in any one hour in which visible emission cannot exceed 30 percent. All other spray booths are limited to 20/30% opacity (Condition V.A.7).

All finishing is required to be in compliance with MACT JJ (Condition V.A.8).

### **Monitoring**

Weekly visible emission observations are required from each spray booth; a log of the observations is required to be maintained (Condition V.B.1).

Operation and Maintenance Procedure requirements are outlined in the permit – these requirements include developing a maintenance schedule, inspection schedule, written operating procedures, training, spare parts and recordkeeping (Condition V.B.2).

### **Recordkeeping**

Records of finishing emission data and operating parameters in order to ensure compliance are required to be maintained by the source. These records include Plant 2 Finishing Line throughput and emissions, Plant 2 Finishing Line lumber throughput, Plant 2 Finishing Line operating hours, Combined plant throughput, Combined plant emissions, MACT JJ monthly averaging option, results of visible emission evaluations and Operation and Maintenance records (Condition V.C.1, 2, 3, 4, 5, 6, 7 and 8).

### **Testing**

The permit does not require source tests in EU-F. The DEQ and EPA have authority to require testing not included in this permit if necessary to determine compliance with an emission limit or standard (Conditions V.D.1, 2 and 3).

### **Reporting**

Reporting requirements are contained in the General Conditions section of the permit.

### **EU Con-Adh**

### **Limitations**

The contact adhesive process is required to be operated in compliance with MACT JJ (Condition VI.A.1).

The equipment that is subject to MACT DDDD (Dimension Mill - Plant 06 (Fingerjoint

Machine, Rosenquist HF Gluer, L & L Clam Shell Gluer and Taylor Glue Reels), Panel Plant - Plant 05 (Wemhoner Hot Press, Buerkle Hot Press, Newman Cold Presses, Fletcher Combo Machine, Fletcher Edge Banders, Holzma Dbl Sided Bander and Rosenquist HF Gluer) and Shoda Building - Plant 07 (Rosenquist Clam Shell) are required to be operated in compliance with MACT DDDD (Condition VI.A.2).

Particulate emissions from each contact adhesive spray booth is required to be controlled by water wash spray booths, spray booth dry filters or equivalent (Condition VI.A.3).

Visible emissions from each contact adhesive spray booth shall not exceed 20% opacity except during one six-minute period in any one hour in which visible emissions shall not exceed 30% opacity (Condition VI.A.4).

### **Monitoring**

Weekly visible emission observations are required from each spray booth; a log of the observations is required to be maintained (Condition VI.B.1).

Operation and Maintenance Procedure requirements are outlined in the permit – these requirements include developing a maintenance schedule, inspection schedule, written operating procedures, training, spare parts and recordkeeping (Condition VI.B.2).

### **Recordkeeping**

Records of contact adhesive process emission data and operating parameters in order to ensure compliance are required to be maintained by the source. These records include Contact Adhesive throughput and emissions, glue inventory, results of visible emission evaluations and Operation and Maintenance records (Condition VI.C.1, 2, 3 and 4).

### **Testing**

The permit does not require source tests in EU-Con-Adh. The DEQ and EPA have authority to require testing not included in this permit if necessary to determine compliance with an emission limit or standard (Conditions VI.D.1, 2 and 3).

### **Reporting**

Reporting requirements are contained in the General Conditions section of the permit.

## **EU-DK**

### **Limitations**

The lumber drying kilns are subject to MACT DDDD and are required to be operated in compliance with that MACT (Condition VII.A).

### **Monitoring**

No monitoring requirements are included in this permit.

### **Recordkeeping**

Records of emission data and operating parameters in order to ensure compliance are required to be maintained by the source. These records include lumber throughput, VOC emissions and MACT DDDD records (Condition VII.C.1, 2 and 3).

### **Testing**

The permit does not require source tests in EU-DK. The DEQ and EPA have authority to require testing not included in this permit if necessary to determine compliance with an emission limit or standard (Conditions VII.D.1 and 2).

### **Reporting**

Reporting requirements are contained in the General Conditions section of the permit.

## **Wood Furniture MACT**

The permit contains the limitations, monitoring, recordkeeping, testing and reporting requirements contained in 40 CFR Part 63 Subpart JJ and the applicable provisions of General Provisions, Subpart A of 40 CFR Part 63.

### **Streamlined Requirements**

1. EU-B (Boilers); SO<sub>2</sub> emissions for wood/fuel oil Erie City boiler FB1 and fuel oil Hurst boiler FB3: The 9 VAC 5-40-930A1 emission limit of 2.64 SO<sub>2</sub>/million Btu is streamlined out to the more restrictive 0.51 lbs/million Btu based on AP-42 emission factors for fuel oil fired boilers (Chapter 1.3 (9/98)).
2. EU-B (Boilers); Particulate Matter and PM<sub>10</sub> emissions for fuel oil Hurst boiler FB3: The 9

VAC 5-40-900A1 emission limit is streamlined out to the more restrictive 0.014 lbs/million Btu based on AP-42 emission factors for fuel oil fired boilers (Chapter 1.3(9/98)).

3. EU-WW, EU-F and EU-Con-Adh (Woodworking, Finishing and Contact Adhesive): Except for specific identified equipment having tighter NSR permit limitations, the 9 VAC 5-40-80 regulation limiting visible emissions to 20% opacity except for 60% during one six minute period per hour for pre-1972 equipment is streamlined out by the more restrictive 9 VAC 5-50-80 limitation of 20% opacity except for 30% during one six minute period per hour for post-1972 equipment for all the equipment in EU-WW, EU-F and EU-Con-Adh. This will simplify and minimize confusion with the visible emission limit and its periodic monitoring, recordkeeping and reporting. It also provides operation flexibility to modify and install new equipment in cases not otherwise requiring an NSR permit. This limit is widely applied, is easily met by these processes and was included in the original Title V permit.

4. Obsolete conditions: The conditions in the NSR permits are streamlined out which deal with new equipment installation time frames and startup initial notifications, initial visible emission evaluations and initial stack tests because these conditions are obsolete due to having been completed. This streamlining was included in the original Title V permit.

## **GENERAL CONDITIONS**

The permit contains general conditions required by 40 CFR Part 70 and 9 VAC 5-80-110 that apply to all Federal-operating permitted sources. These include requirements for submitting semi-annual monitoring reports and an annual compliance certification report. The permit also requires notification of deviations from permit requirements or any excess emissions.

### **B. Permit Expiration**

This condition refers to the Board taking action on a permit application. The Board is the State Air Pollution Control Board. The authority to take action on permit application(s) has been delegated to the Regions as allowed by §2.1-20.01:2 and §10.1-1185 of the *Code of Virginia*, and the “Department of Environmental Quality Agency Policy Statement No. 3-2006”.

This general condition cite(s) the Article(s) that follow(s):

Article 1 (9 VAC 5-80-50 et seq.), Part II of 9 VAC 5 Chapter 80. Federal Operating Permits for Stationary Sources

This general condition cites the sections that follow:

9 VAC 5-80-80. Application

9 VAC 5-80-140. Permit Shield

9 VAC 5-80-150. Action on Permit Applications

## **F. Failure/Malfunction Reporting**

Section 9 VAC 5-20-180 requires malfunction and excess emission reporting within four hours of discovery. Section 9 VAC 5-80-250 of the Title V regulations also requires malfunction reporting; however, reporting is required within two days. Section 9 VAC 5-20-180 is from the general regulations. All affected facilities are subject to section 9 VAC 5-20-180 including Title V facilities. Section 9 VAC 5-80-250 is from the Title V regulations. Title V facilities are subject to both sections. A facility may make a single report that meets the requirements of 9 VAC 5-20-180 and 9 VAC 5-80-250. The report must be made within four daytime business hours of discovery of the malfunction.

This general condition cites the sections that follow:

- 9 VAC 5-40-41. Emissions Monitoring Procedures for Existing Sources
- 9 VAC 5-40-50. Notification, Records and Reporting
- 9 VAC 5-50-50. Notification, Records and Reporting

## **J. Permit Modification**

This general condition cites the sections that follow:

- 9 VAC 5-80-50. Applicability, Federal Operating Permit For Stationary Sources
- 9 VAC 5-80-190. Changes to Permits.
- 9 VAC 5-80-260. Enforcement.
- 9 VAC 5-80-1100. Applicability, Permits For New and Modified Stationary Sources
- 9 VAC 5-80-1790. Applicability, Permits For Major Stationary Sources and Modifications Located in Prevention of Significant Deterioration Areas
- 9 VAC 5-80-2000. Applicability, Permits for Major Stationary Sources and Major Modifications Locating in Nonattainment Areas

## **U. Malfunction as an Affirmative Defense**

The regulations contain two reporting requirements for malfunctions that coincide. The reporting requirements are listed in sections 9 VAC 5-80-250 and 9 VAC 5-20-180. The malfunction requirements are listed in General Condition U and General Condition F. For further explanation see the comments on general condition F.

## **Y. Asbestos Requirements**

The Virginia Department of Labor and Industry under Section 40.1-51.20 of the Code of Virginia also holds authority to enforce 40 CFR 61 Subpart M, National Emission Standards for Asbestos.

## **STATE ONLY APPLICABLE REQUIREMENTS**

The permit does not contain a State Only Applicable Requirements section.

## **FUTURE APPLICABLE REQUIREMENTS**

MACT DDDDD (Industrial Boilers) was vacated by the Federal courts; the source was subject to this MACT and may be subject to a future Industrial Boiler MACT.

## **INAPPLICABLE REQUIREMENTS**

The boilers at this facility are not subject to NSPS Dc to due the date of installation or the size of the boiler.

The startup, shut down, and malfunction opacity exclusion listed in 9 VAC 5-40-20 A 3 cannot be included in any Title V permit. This portion of the regulation is not part of the federally approved state implementation plan. The opacity standard applies to existing sources at all times including startup, shutdown, and malfunction. Opacity exceedances during malfunction can be affirmatively defended provided all requirements of the affirmative defense section of this permit are met. Opacity exceedances during startup and shut down will be reviewed with enforcement discretion using the requirements of 9 VAC 5-40-20 E, which state that "At all times, including periods of startup, shutdown, soot blowing and malfunction, owners shall, to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with air pollution control practices for minimizing emissions."

Compliance Assurance Monitoring (CAM) – CAM is not applicable to any of the emission units at this facility. CAM is applicable to an emission unit that is controlled and has a potential to emit (without control) of greater than 100 tpy for any regulated pollutant. All of the emission units at this facility that have control devices have potential to emit levels that are below 100 tpy for any regulated pollutant. The two wood fired boilers (FB1 and FB2) have received determinations from the Air Compliance office at DEQ-WCRO that state that the multicyclones installed on those boilers are considered inherent process equipment for CAM applicability and therefore those emissions units are not subject to CAM.

## **COMPLIANCE PLAN**

The facility is currently in compliance and does not have a compliance plan.

## **INSIGNIFICANT EMISSION UNITS**



The insignificant emission units are presumed to be in compliance with all requirements of the Clean Air Act as may apply. Based on this presumption, no monitoring, recordkeeping or reporting shall be required for these emission units in accordance with 9 VAC 5-80-110.

Insignificant emission units include the following:

Emission Unit No.	Emission Unit Description	Citation <sup>1</sup>	Pollutant(s) Emitted (9 VAC 5-80-720 B)	Rated Capacity (9 VAC 5-80-720 C)
Gluing	Gluing (except for the Contact Adhesive operation)	9 VAC 5-80-720 B,C	VOC (less than 5 tpy)	Includes up to 2 million Btu/hr capacity natural gas heat per hot plate glue press.
Maintenance Parts Washers	Maintenance Parts Washers that do not use halogenated solvents.	9 VAC 5-80-720 A,B	VOC (less than 5 tpy)	NA
Fire Pumps	One (1) Emergency Diesel Fire Pump	9 VAC 5-80-720 C		One (1) 190 hp
Vacuum Pump Room	Vacuum Pump Room	9 VAC 5-80-720 A,B	VOC (less than 5 tpy)	NA
Facility Air Compressors	Powered by electric motors.	9 VAC 5-80-720 A	VOC (less than 5 tpy)	NA
Misc. Storage Tanks	15 AST – Finishing Materials 1 AST – Gasoline 1 AST – Diesel 1 AST - #2 Fuel Oil 1 AST – Used Oil	9 VAC 5-80-720 B	VOC (less than 5 tpy)	Capacity of each tank is less than 10,000 gallons (most are much smaller).

<sup>1</sup>The citation criteria for insignificant activities are as follows:

9 VAC 5-80-720 A - Listed Insignificant Activity, Not Included in Permit Application

9 VAC 5-80-720 B - Insignificant due to emission levels

9 VAC 5-80-720 C - Insignificant due to size or production rate

## CONFIDENTIAL INFORMATION

The permittee did not submit a request for confidentiality. All portions of the Title V application are suitable for public review.

## PUBLIC PARTICIPATION

The proposed permit will be placed on public notice in the Martinsville Bulletin from

May 16, 2008 to June 15, 2008.